

Hon. Lewis. J. Liman
United States District Court
Southern District of New York
500 Pearl Street, Room 1620
New York, NY 10007

**Re: Notice of Intent to File a Motion to Quash in Lively v Wayfarer Studios LLC
(1:24-cv100049)**

Dear Judge Liman,

I am writing to formally notify the Court of my intent to file a motion to quash the subpoena issued by Plaintiff Blake Lively to Google LLC (subpoena reference no. 100884180), served by Esra Hudson of Manatt, Phelps & Phillips LLP.

I am a non-party independent content creator operating the YouTube channel "@LethalLauren904." I have no affiliation with any parties involved in this case. My forthcoming motion to quash will be accompanied by a detailed supporting memorandum based on the following grounds:

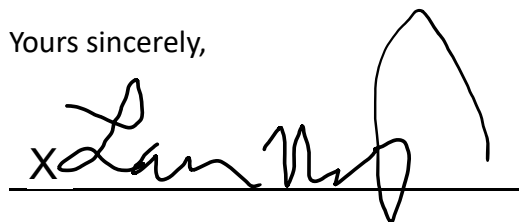
1. Violation of First Amendment Rights: My commentary about matters of public concern is constitutionally protected. Plaintiff has failed to demonstrate any valid evidentiary basis justifying the infringement of my right to keep my personal information anonymous.
2. Stored Communications Act Violation (18 U.S.C. § 2702(b)(3)): Google lacks my consent to disclose my personal subscriber information and communications.
3. Improper Issuance under FRCP 45(c): Plaintiff's subpoena was improperly issued from the Southern District of New York, exceeding Rule 45's geographic limits, since compliance is requested from Google LLC, which is located in California.
4. Unduly Burdensome and Overbroad: The subpoena's expansive request for personal identifiers, financial, geolocation, and other sensitive data is irrelevant, disproportionate, and designed to harass and intimidate.

5. Irreparable Harm: Disclosure of my information threatens serious harm to my privacy, safety, and professional reputation.

Given these abuses, I intend to seek appropriate sanctions under Rule 45(d)(1), including reimbursement of my reasonable expenses. I will also request a protective order under Rule 26(c) barring Plaintiff from further similar abusive discovery without prior court approval.

I anticipate filing the formal Motion to Quash and accompanying materials within the timeline prescribed by the applicable rules or as otherwise directed by this Court.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Lauren Neidigh', is written over a horizontal line. The signature is stylized with a large, looped 'L' and a prominent 'N'.

Ms. Lauren Neidigh

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Dated: 07/16/2025